

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Harrisburg Division

IN RE: Michael James Walker	Case No. 1:25-bk-01554-HWV Chapter 13
Freedom Mortgage Corporation, Movant	
vs.	
Michael James Walker , Debtor	

**OBJECTION TO CONFIRMATION
OF DEBTOR CHAPTER 13 PLAN**

Freedom Mortgage Corporation ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor Chapter 13 Plan* (Doc 09), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on May 30, 2025.

2. Movant holds a security interest in the Debtor real property located at 2320 Delta Rd, Brogue, PA 17309 (the "Property"), by virtue of a Mortgage which is recorded as instrument Number 2018008889 in Official Records of York County, Pennsylvania. Said Mortgage secures a Note in the amount of \$173,794.00.

3. The Debtor filed a Chapter 13 Plan (the "Plan") on May 30, 2025 (Doc 09).

4. The Plan includes payments toward the Note and Mortgage with Movant, however the figures used by the Debtor are inaccurate. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is

\$105,429.27, whereas the Plan proposes to pay only \$104,932.27. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed. Movant objects to any plan which proposes to pay it anything less than \$105,429.27 as the pre-petition arrearage over the life of the plan.

5. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due to Movant is \$105,429.27. Therefore, the Movant objects to Debtor proposed Chapter 13 Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

6. Movant objects to any plan which proposes to pay it anything less than \$105,429.27 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection To Confirmation Of Debtor Chapter 13 Plan has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Michael A. Cibik, Debtor Attorney
1500 Walnut Street
Suite 900
Philadelphia, PA 19102
mail@cibiklaw.com

Jack N Zaharopoulos, Bankruptcy Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

US Courthouse, US Trustee
1501 N. 6th St
Harrisburg, PA 17102

Via First Class Mail:

MICHAEL JAMES WALKER
2320 Delta Road
Brogue, PA 17309

Date: June 19, 2025

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Mario Hanyon, PA Bar No. 203993

Ryan Srnik, PA Bar No. 334854

Jay Jones, PA Bar No. 86657

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